

## REMARKS

Claims 1-20 are currently pending in the application. Claims 1, 9 and 20 are independent claims. By this amendment, claims 12-20 are added. Support for new claims 12-20 can be found on paragraphs [0007] – [0016] of the instant published application 2002/0165909. No new matter has been added. Reconsideration and withdrawal of all pending rejections in view of the above amendments and following remarks is respectfully requested.

### **35 U.S.C. § 103 Rejections**

#### Over Sarukkai with Glance

Claims 1 and 4-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,775,695 to SARUKKAI in view of U. S. Patent No. 6,415,368 to GLANCE et al. This rejection is respectfully traversed.

Claim 1 is directed to a method for adapting to change in a demand on a web server. In particular, representative claim 1 recites, in pertinent part:

associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers; and  
analyzing the identifications of web pages requested by the browsers to determine caching priorities for the web server.

Similarly, claim 9 is directed to a method for adapting to change in a demand on a web server. In particular, representative claim 9 recites, in pertinent part:

associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers;  
analyzing the identifications of web pages requested by the browsers to determine caching priorities for the web server; and  
altering a server cache responsive to the caching priorities.

Such features are not disclosed or suggested by the combination of SARUKKAI and GLANCE.

Applicants do not dispute that SARUKKAI relates to document caching with a server (see col. 1, lines 6-9). Nor do Applicants dispute that the disclosed system is

capable of "monitoring the number of documents requested by a client in a current session, placing a document requested by the client in a file cache according to a caching algorithm that is based, at least in part, on the number of documents requested by the client in the current session, and accessing the document in the file cache when the document is requested subsequently by the client. The wide area network is typically the Internet" (see col. 2, lines 14-21). However, it is clear from a fair reading of this document that SARUKKAI stores the document itself into the cache based on the probability that it will be requested (see col. 8, lines 32-43). In contrast, the invention provides for associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers. As the Examiner will note from paragraph [0014] of the instant published application 2002/0165909, session tracking objects constitute information about the requests for web pages by the browsers and this information identifies each of the browsers. This distinction is not without a difference because the instant invention enables session tracking of the session objects in order to detect changes in demand more rapidly.

GLANCE does not cure the deficiencies of SARUKKAI. GLANCE merely discloses a system and method of caching based on a recommender system. The disclosed system employs a democratic caching generally shown by reference numeral 10. A recommender system 16 provides value information pertaining to items to be stored in cache 24 based on user input (col. 4, lines 43-53) that includes implicit site recommendations (col. 5, lines 24-55) and explicit URL recommendations (col. 5, lines 65 et seq.). GLANCE, like SARUKKAI, does not disclose or suggest associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers. GLANCE does not even determine caching priorities for the server by analyzing the identifications of web pages requested by the browsers.

As GLANCE fails to cure the deficiencies of SARUKKAI, there can be no motivation to combine these references. Furthermore, even if SARUKKAI and GLANCE were properly combinable, the combination would not result in the invention as recited

in at least claims 1 and 9 including, *inter alia*, analyzing the identifications of web pages requested by the browsers to determine caching priorities for the web server.

Because, there is no suggestion or disclosure in SARUKKAI and GLANCE separately or in any proper combination that render obvious the features of the present claimed invention, the Examiner is respectfully requested to withdraw the rejection under 35 U.S.C. § 103.

Thus, claims 1 and 9 are allowable over the combination of SARUKKAI and GLANCE. Moreover, claims 4-8, 10 and 11 depend from claims 1 and 9, and are also allowable for the same reasons as claims 1 and 9, as well as for their added features.

Over Sarukkai with Glance and Ronald

Claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,775,695 to SARUKKAI in view of U. S. Patent No. 6,415,368 to GLANCE et al., and further in view of U. S. Patent Application Publication No. 2003/0041143 to RONALD et al. This rejection is respectfully traversed.

As explained above, SARUKKAI relates to document caching with a server (see col. 1, lines 6-9) and discloses a system is capable of "monitoring the number of documents requested by a client in a current session, placing a document requested by the client in a file cache according to a caching algorithm that is based, at least in part, on the number of documents requested by the client in the current session, and accessing the document in the file cache when the document is requested subsequently by the client. The wide area network is typically the Internet" (see col. 2, lines 14-21). However, it is clear from a fair reading of this document that SARUKKAI stores the document itself into the cache based on the probability that it will be requested (see col. 8, lines 32-43). In contrast, the invention provides for associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers.

Again, GLANCE does not cure the deficiencies of SARUKKAI. GLANCE merely discloses a system and method of caching based on a recommender system. As noted above, GLANCE, like SARUKKAI, does not disclose or suggest associating session tracking objects with browsers that access a web server, wherein the session tracking

objects include identifications of web pages requested by the browsers. GLANCE does not even determine caching priorities for the server by analyzing the identifications of web pages requested by the browsers.

RONALD does not cure the deficiencies of SARUKKAI and GLANCE. RONALD relates to a system for obtaining demographic information about network users. There is no apparent disclosure with regard to associating session tracking objects with browsers that access a web server, wherein the session tracking objects include identifications of web pages requested by the browsers. Nor has the Examiner even alleged as much.

Thus, RONALD fails to cure the deficiencies of SARUKKAI and GLANCE. Furthermore, even if SARUKKAI, GLANCE and RONALD were properly combinable, the combination would not result in the invention as recited in at least claim 1 including, *inter alia*, analyzing the identifications of web pages requested by the browsers to determine caching priorities for the web server.

Because, there is no suggestion or disclosure in SARUKKAI, GLANCE and RONALD separately or in any proper combination that render obvious the features of the present claimed invention, the Examiner is respectfully requested to withdraw the rejection under 35 U.S.C. § 103.

Thus, claim 1 is allowable over the combination of SARUKKAI, GLANCE and RONALD. Moreover, claims 2-3 depend from claim 1, and are also allowable for the same reasons as claim 1, as well as for their added features.

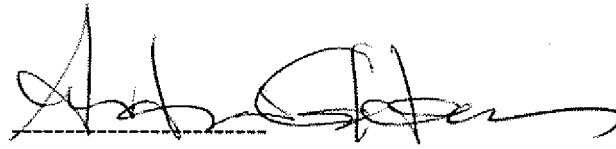
### ***New Claims are also Allowable***

Applicants submit that the new claims 12-20 are allowable over the applied art of record. Specifically, claims 12-19 depend from claims 1 and 9 which are believed to be allowable. Additionally, claims 12-20 recite a combination of features which are clearly not disclosed or suggested by the applied art of record. Accordingly, Applicants respectfully request consideration of these claims and further request that the above-noted claims be indicated as being allowable.

### CONCLUSIONS

In view of the foregoing amendments and remarks, Applicants submit that all of the rejections have been overcome, and that the claims are patentably distinct from the prior art of record and in condition for allowance. The Examiner is respectfully requested to pass the above application to issue, and to contact the undersigned at the telephone number listed below, if needed. Applicants hereby make a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to **IBM Deposit Account No. 09-0457 (Endicott)**.

Respectfully submitted,  
Michael Christopher MARTIN, *et al.*

A handwritten signature in black ink, appearing to read 'Andrew M. Calderon', written over a horizontal dashed line.

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